



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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MARY F. McTIGUE
DIRECTOR

August 22, 1991
AO-91-15

Representative David J. Lionett
State House
Room 237
Boston, MA 02133

Re: "Meet the Voter" Event

Dear Representative Lionett:

This letter is in response to your June 19, 1991, letter to Mr. Brad Balzer requesting an advisory opinion regarding certain "meet the voters" events that you are considering sponsoring or attending.

You have stated in your letter and in conversations with Mr. Balzer that your political committee wishes to sponsor a "meet the voters" event for you in the Worcester area. The primary purpose of the event is to enhance your political future. It is my understanding that your political committee will pay all expenses, handle promotion and record keeping and retain all contributions (if any).¹ You anticipate that another candidate will be invited to attend the event as a "special guest". You have asked if this arrangement complies with the requirements of M.G.L. c.55. You have also asked if you can attend a "meet the voters" event sponsored and financed by another candidate as that candidate's "special guest". Neither situation will involve either joint fundraising or joint expenditures by your political committee or the special guest's political committee.

The arrangement you have described is similar to an arrangement addressed by this Office in an earlier advisory

1. The event's primary purpose is to meet voters rather than to raise monies. If fundraising occurs, this opinion assumes that it will be done by and for your political committee when your committee is sponsoring the event and by/for another candidate's political committee when you are the special guest of that political committee.

opinion dated February 18, 1988. See AO-88-03. In that opinion, this Office concluded that a fund-raising event would comply with the provisions of M.G.L. c.55 provided "all solicitation and promotional materials clearly denominated your committee as the sponsor of the [event] and mentioned [the other candidate] solely in his role as a featured speaker".

The Office's opinion is applicable to facts set forth above even though the focus of your event is on meeting voters. Therefore, your political committee's sponsorship of the described "meet the voters" event would not violate the provisions of M.G.L. c.55 provided the event's purpose was to enhance your political future. The cautionary note in the Office's earlier opinion is applicable here. Specifically, it is important that there be no implication that the "special guest" is financially benefiting from the event. If funds are raised by the event, such contributions must be received by your political committee, and made payable directly to your committee.

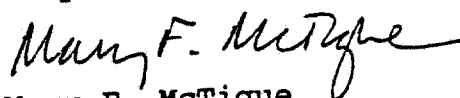
The reason for this cautionary note is to insure that M.G.L. c.55, s.6 (which prohibits a political committee such as yours from contributing more than \$100 to another political committee organized on behalf of a candidate) is not inadvertently violated. If your committee were to sponsor a "meet the voters" event primarily to benefit another candidate and such an event cost more than \$100 or raised more than that amount for that candidate, your political committee would be deemed to have violated the campaign finance laws.

For the reasons discussed above, it is the opinion of this Office that you also may attend another candidate's "meet the voters" event as a special guest. Of course, the same cautionary note would apply to the other candidate's political committee under the reversed situation.

This opinion has been rendered solely on the basis of the representations in your letter and your conversations with Mr. Balzer and solely in the context of M.G.L. c.55.

Please do not hesitate to contact this Office should you have additional questions.

Very truly yours,



Mary F. McTigue
Director

cc: Mr. Brad Balzer
Ms. Lisa McDonough